

ADDENDUM TO THE FACT SHEET  
FOR NATIONAL POLLUTANT DISCHARGE  
ELIMINATION SYSTEM (NPDES)  
PERMIT NO. WA0039616

I. GENERAL INFORMATION

Facility: SEH American, Inc.  
4111 Northeast 112<sup>th</sup> Avenue  
Vancouver, WA 98668

II. APPLICATION REVIEW

An application for permit reissuance was submitted to the Department of Ecology (Ecology) on January 8, 2007, and accepted by Ecology on February 20, 2007. The scope and manner of any review of an application for replacement of permit by Ecology shall be sufficiently detailed as to insure the following:

- That the Permittee is in substantial compliance with all of the terms, conditions, requirements and schedules of compliance of the expired permit;
- That Ecology has up-to date information on the Permittee's production levels; Permittee's waste treatment practices; nature, content, and frequencies of Permittee's discharge; either pursuant to the submission of new forms and applications or pursuant to monitoring records and reports resubmitted to Ecology by the Permittee; and
- That the discharge is consistent with applicable effluent standards and limitations, water quality standards, and other legally applicable requirements listed in WAC 173-216 and WAC 173-200.

The application for SEH America, Inc. was reviewed and indicates that no changes in the treatment characteristics of the effluent process or volume of wastewater has occurred.

III. PERMIT REAUTHORIZATION

This fact sheet addendum accompanies the draft permit, which is to be reauthorized to SEH America, Inc. for the discharge of wastewater to Burnt Bridge Creek and land. The previous fact sheet is also part of this administrative record and explains the basis for the discharge limitations and conditions of the reauthorized permit.

The existing permit requirements, including discharge limitations and monitoring, do not need to be changed to protect the receiving water quality. The previous fact sheet addressed conditions and issues at the facility at the time when the previous permit was issued, and statements made reflected the status in 2003. Since the issuance of the current permit, Ecology has not received any information which indicates that environmental impacts from the discharge that were not evaluated at the time of the last permit issuance is persuasive enough to undertake a complete renewal of the permit. The reauthorized permit is virtually identical to the previous permit issued on July 1, 2003.

The discharge limits and conditions in effect at the time of expiration of the previous permit are carried over unchanged to this reauthorized permit. Assessment of compliance and inspections of the facility during the previous permit term indicate that the facility should not be placed on a high priority for permit renewal. Ecology assigns a high priority for permit renewals in situations where water quality would materially benefit from a more stringent permit during the next five-year cycle.

The permit reauthorization process, in concert with the routine renewal of high priority permits, allows Ecology to reissue permits in a timely manner and minimize the number of active permits that have passed expiration dates. A system of ranking the relative significance of the environmental benefit to be gained by renewing a permit rather than reauthorizing a permit is followed during Ecology's annual permit planning process. Each permit that is due for reissuance is assessed and compared with other permits that are also due for reissuance. The public is notified and input is sought after the initial draft ranking has tentatively established which permits are likely to be completely renewed and which are likely to be reauthorized. All relevant comments and suggestions are considered before a final decision is made regarding the type of reissuance for each permit.

The only changes to the previous permit are the submittal date requirements. Submittal requirements from the previous permit that were completed and submitted and do not require additional or continued assessment were removed from this permit. The submittal dates for the other standard compliance and submittal requirements that have been carried over from the past permit into this reauthorized permit have been adjusted to the proposed permit schedule. Ecology considered these submittals necessary in the previous permit and no information has come forward to cause a reconsideration of the submittal requirement.

Public notice of the availability of the draft reauthorized permit is required at least 30 days before the permit is issued [Washington Administrative Code (WAC) 173-220-050]. The fact sheet and draft permit are available for review (see Appendix A—Public Involvement for more detail on the Public Notice procedures).

After the public comment period has closed, Ecology will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file for the permit and parties submitting comments will receive a copy of Ecology's response. Comments and the resultant changes to the permit will be summarized in the fact sheet addendum, Appendix B—Response to Comments.

#### IV. RECOMMENDATION FOR PERMIT ISSUANCE

Ecology proposes that this permit be issued for five years.

## **APPENDIX A – PUBLIC INVOLVEMENT INFORMATION**

Ecology has determined to reauthorize a discharge permit to the applicant listed on page 1 of this fact sheet addendum. The permit contains conditions and effluent limitations that are described in the fact sheet.

Public notice of application was published on March 1, 2007, and March 9, 2007, in the *Columbian* to inform the public that an application had been submitted and to invite comment on the reauthorization of this permit.

Ecology will publish a Public Notice of Draft (PNOD) on July 25, 2008, in the *Columbian* to inform the public that a draft permit and fact sheet are available for review. Interested persons are invited to submit written comments regarding the draft permit. The draft permit, fact sheet addendum, and fact sheet are available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the regional office listed below. Written comments should be mailed to:

Industrial Unit Permit Coordinator  
Department of Ecology  
Southwest Regional Office  
P.O. Box 47775  
Olympia, Washington 98504-7775

Any interested party may comment on the draft permit or request a public hearing on this draft permit within the 30 day comment period to the address above. The request for a hearing shall indicate the interest of the party and the reasons why the hearing is warranted. Ecology will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-220-090). Public notice regarding any hearing will be circulated at least 30 days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing (WAC 173-220-100).

Comments should reference specific test followed by proposed modification or concern when possible. Comments may address technical issues, accuracy and completeness of information, the scope of the facility's proposed coverage, adequacy of environmental protection, permit conditions, or any other concern that would result from reauthorization of this permit.

Ecology will consider all comments received within 30 days from the date of the PNOD indicated above, in formulating a final determination to issue, revise, or deny the permit. Ecology's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from Ecology by telephone at 360-407-6280, or by writing to the address listed above.

**APPENDIX B – RESPONSE TO COMMENTS**

No comments were received by Ecology.